

FROM: Bruce Wickerski

TO: Paula Lyon

DATE: 01-11-91

TIME: 14:26

CC: Bruce Wickerski

Joe Baldwin

SUBJECT: [REDACTED] Waste Determinat

PRIORITY:

ATTACHMENTS:

Paula-

This memo is to formally request what we discussed on 1/9, regarding the former train roundhouse site at Avery Landing in northern Idaho.

We are in the process of negotiating with Potlatch remedial measures which would cease the leakage of some inadequately characterized petroleum products into the St. Joe river. Their proposal is to recover the "product" (used in the separated or free sense) with a recovery trench and pumps/skimers and dispose of this material through burning in a industrial boiler in St. Maries.

A sample of the product has been analyzed for EP Tox metals, PNA's, and PCB's. I will hand-deliver these results to you. Specifically I would like your unit to examine them and make determinations/recommendations as to:

- 1) Is the material acceptable to burn in a boiler?
- 2) Is the data adequate, both in terms of parameters and quality, to make this determination and if not what is required?
- 3) Would the material be considered a hazardous waste? What levels of the PNA's in particular would be considered critical levels for this determination?

As I mentioned above the site was used as a roundhouse for trains which stopped in Avery and were pulled over the Continental Divide via electric engines. Since trains were refueled there fuel tanks were present, spills were probably common. A large variety of material has been buried at the site as for example in one test pit about eight feet of railroad ties were discovered. Transformers were also possibly disposed of. The site has since been razed. Our remediation objectives are primarily to stop free product from entering the river and interest at this point in characterization of the material is primarily to determine suitable disposal alternatives.

HMB has initiated a PA process on the site (which has been visited by Clyde Cody) for possible CERCLIS listing.

We would like to include your comments as part of a response to Potlatch which will list what our major concerns are and the adequacy of their proposal. If it would be possible to do this for us in the timeframe of 1 to 2 weeks that would be great. If you have any additional questions give me a call. Thanks.

USEPA SF



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